

Monday, December 12, 2005

Tennessee Regulatory Authority  
Attn: Chairman Ron Jones  
460 James Robertson Parkway  
Nashville, TN 37243-0505

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**RE: Letter from Helping Hands (Docket No. 05-00141)**

Dear Chairman Jones,

It appears that Helping Hands Home Association (HHHA) and Tennessee Alliance of Information & Referral Systems (TNAIRS) have gotten into a letter writing campaign that might best be resolved by setting a hearing on the TNAIRS Petition for full statewide 2-1-1 coverage filed on November 29, 2005, and being docket number 04-00342. The recent letters began when the undersigned on November 23, 2005, wrote Mr Middlebrook of HHHA and asked that HHHA withdraw their Petition to provide service to eight counties in East Tennessee in favor of the Petition of TNAIRS to provide statewide 2-1-1 service. I recently discovered the November 16, 2005, letter of Mr. Middlebrook on the TRA's web site. In that letter Mr. Middlebrook asks for additional time to respond to certain requests for information posed by Ms. Darlene Standley. As noted in the letter, HHHA is asking for additional time having already received two time extensions previously. TNAIRS is anxious to proceed with its petition to provide statewide 2-1-1 service.

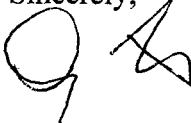
On November 30, Mr. Middlebrook responded to my letter and stated that HHHA was not withdrawing their Petition, which letter was copied to you and has thus been placed in the TRA's web site. Since HHHA is not willing to withdraw it appears that we have no choice except to intervene in their Petition and request that our Petition for Statewide relief be heard as soon as possible. To this end, we will be filing a formal intervention. While the funds available for 2-1-1 service are limited (indeed that was one of the chief reasons that Knox County's 2-1-1 service did not succeed) we need the air to be cleared so that the needs of the entire state may be addressed. To this end we would object to any extension being given HHHA in providing the requested information. They have had since September 6, 2005, to provide this information and if their proposal was viable, then such information must surely be available. Also in reading HHHA's letter dated November 16 and received by the TRA on December 2, there are numerous errors which I, as 2-1-1 State Director, must address:

1. 2-1-1 funders in Knoxville are not involved with Helping Hands Home Assistance. They provide funding to East TN Information & Referral. HHHA has never been involved in the funding model for 2-1-1 in the Knoxville area. Gary Young, ETIR's current President, says that his funders have only praised the current 2-1-1 system which has been operating since July 2005 and is answered by certified Information & Referral Specialists in Middle TN 2-1-1. United Ways

- in HHHA's proposed coverage area have submitted letters to the TRA stating that they do not support HHHA's plan and do support TNAIRS's plan.
2. Local funders are enthusiastically supportive of the plan to send calls to Nashville 2-1-1 because the call center in Nashville provides a higher level of service at a lower cost than the 2-1-1 call center ever did when it was located in Knoxville. The database of resources will be maintained locally by the Knoxville/Knox County Community Action Committee Office on Aging Information & Referral Service (the local TNAIRS aging I&R) according to AIRS standards.
  3. The current plan from TNAIRS is sustainable for every call center, including those in rural counties. HHHA has not been involved (though they have been invited) in any 2-1-1 planning discussions. Their statement that rural call centers will not be able to sustain their operations when 2-1-1 is activated is incorrect.
  4. United Ways across Tennessee do fund 2-1-1. In fact, all of the call centers in the TNAIRS plan receive funding from their local United Ways. Many also receive funding from local government and state/federal grants. HHHA's assertion that United Ways in Tennessee do not fund 2-1-1 is incorrect.

It is unfortunate that this matter has come to this in that I do believe everyone is interested in providing a viable, professional 2-1-1 service for their constituents. TNAIRS simply believes this can be best accomplished in the manner it has suggested in its Petition and not on what is basically an ad hoc basis. Thank you for your attention.

Sincerely,



Doug Fluegel  
2-1-1 State Director  
TNAIRS